

EXHIBIT I

Proposed Order of Judgment by Default

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

X
IN RE: TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03 MDL 1570 (GBD)

X
THIS DOCUMENT RELATES TO:

Fiona Havlish, et al. v. Bin-Laden, et al.
03 CV 9848 (GBD)

This document is filed on behalf of those Plaintiffs in the above case seeking unliquidated damages for losses as they relate to personal injuries and deaths suffered by victims of the September 11th Terrorist Attacks. Those Plaintiffs are listed in Exhibit A attached hereto.

DEAFULT JUDGMENT

This action having been commenced on February 19, 2002 in the United States District Court, District of Columbia, by the filing of the *Havlish* Summons and Complaint, and Defendants, The Islamic Republic of Iran; Ayatollah Ali Hoseini-Khamenei; Ali Akbar Hashemi Rafsanjani; Iranian Ministry of Information and Security; The Islamic Revolutionary Guard Corps.; Hezbollah; The Iranian Ministry of Petroleum; The National Iranian Tanker Corporation; The National Iranian Gas Company; Iran Airlines; The National Iranian Petrochemical Company; Iranian Ministry of Economic Affairs and Finance; Iranian Ministry of Commerce; Iranian Ministry of Defense and Armed Forces Logistics; and, The Central Bank of the Islamic Republic of Iran (the "Sovereign Defendants") having failed to answer or otherwise defend against this action despite having been properly served, it is hereby

ORDERED, ADJUDGED AND DECREED: The Plaintiffs listed in Exhibit A attached to Plaintiffs' Motion for Entry of Judgment by Default as seeking unliquidated damages for losses shall be entitled to Judgment against the Sovereign Defendants after a full hearing to

determine Plaintiffs' right of recovery, provided the Plaintiffs produce evidence of liability and damages which is satisfactory to the Court.

A hearing before this Court to establish each Plaintiff's right to recovery will be held on the _____ day of _____, 2008 beginning at _____ a.m. in courtroom 15D of the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York.

United States District Judge

Dated